

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF LOUISIANA
(LAFAYETTE DIVISION)**

ROBBIE BRUCE	:	
	:	CASE NO. 6:25-CV-00520
versus	:	
	:	JUDGE DAVID C. JOSEPH
HOSPITAL SERVICE DISTRICT	:	
NUMBER 1 OF IBERIA PARISH D/B/A	:	MAGISTRATE JUDGE DAVID J. AYO
IBERIA MEDICAL CENTER	:	

DECLARATION OF ANGIE LEMOINE

Pursuant to 28 U.S.C. § 1746, I, Angie Lemoine, declare as follows:

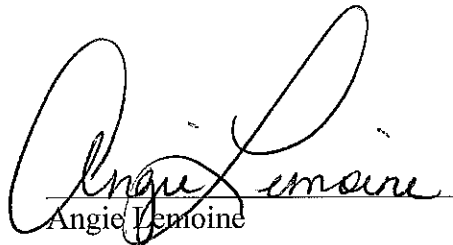
1. I am Director of Human Resources for the Iberia Medical Center.
2. In my role as Director of Human Resources for the Iberia Medical Center, I have access to IMC's personnel files, HR related files and documents, and IMC's Employee Handbook that are kept and maintained in the regular course of its business.
3. I have personally reviewed IMC's records that are kept and maintained in the regular course of business pertaining to Robbie Bruce.
4. I have personal knowledge of the facts and information based on my review of those records.
5. On March 18, 2024, documented by a written Employee Counseling Form, IMC provided Robbie Bruce with written notice of his wrongdoing and provided him with an opportunity to respond and to submit proof that he attempted to renew his pharmacist license prior to it lapsing on December 31, 2024. Robbie Bruce signed this Employee Counseling Form.
6. IMC terminated Robbie Bruce effective April 3, 2024, and he was sent a written letter notifying him of his April 3, 2024 termination.
7. Robbie Bruce was an at-will employee of IMC. He did not have a contract of employment with IMC for a definite term, and IMC never agreed to terminate him only for cause. The IMC Employee Handbook provides in part that "Nothing in this policy

provides any contractual rights regarding employee corrective action or counseling, nor should anything in this policy be read or construed as modifying or altering the employment-at-will relationship between IMC and its employees.”

8. On March 18, 2025 IMC’s Chief Executive Officer received a letter dated March 18, 2025 via email from Robbie Bruce’s attorney, Robin Sylvester. In part, the letter states: “I am legal counsel for Robbie Bruce, and I’m writing to you in an effort to resolve a matter related to his employment before we initiate litigation against Iberia Medical Center ("IMC"). Prior to March 18, 2025, IMC has no record of receiving any such written correspondence regarding Robbie Bruce’s intentions to initiate litigation.
9. IMC has no record of being notified of a Charge of Discrimination on behalf of Robbie Bruce or receiving a Charge of Discrimination on behalf of Robbie Bruce.

I declare under the penalty of perjury that the foregoing is true and correct, pursuant to 28 U.S.C. § 1746.

Dated this 25th day of April 2025.



Angie Lemoine